

FILED IN DISTRICT COURT
OKLAHOMA COUNTYIN THE DISTRICT COURT IN AND FOR OKLAHOMA COUNTY NOV - 3 2020
STATE OF OKLAHOMARICK WARREN
COURT CLERK

AMY GUSTAFSON,)	00 _____
)	
Plaintiff,)	Case No: CJ-2020-2227
vs.)	Judge Don Andrews
ALLSTATE VEHICLE AND PROPERTY)	
INSURANCE COMPANY)	
)	
Defendant.)	
)	

SPECIAL APPEARANCE RESERVING
ADDITIONAL TIME TO FURTHER PLEAD OR ANSWER

COMES NOW Defendant, Allstate Vehicle and Property Insurance Company, by and through its counsel, SMILING, SMILING & BURGESS, and pursuant to Okla. Stat. tit. 12, § 2012, and Campbell v. American International Group, Inc., 976 P.2d 1102, 1999 OK CIV APP 37, hereby enters its appearance specially and reserves an additional twenty (20) days to further plead or answer in this matter. By entering this special appearance, Defendant does not waive any defenses or objections, and, in fact, it expressly reserves the right to assert any and all defenses allowed by Okla. Stat. tit. 12, § 2012, and other Oklahoma law, including, but not limited to, the defenses of lack of personal jurisdiction, failure to state a claim upon which relief can be granted, improper venue, insufficiency of process, insufficiency of service of process, lack of capacity, and/or failure to join a proper party.

Respectfully Submitted,

SMILING, SMILING & BURGESS

By 

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Attorney for Defendant

CERTIFICATE OF MAILING

I hereby certify that on the 26th day of Oct, 2020, the above and foregoing instrument was mailed, with proper postage thereon fully prepaid, to:

Zachary K. Housel, OBA# 32802
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Oklahoma City, OK 73102
(Attorney for Plaintiff)



AMS/dmg
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